

REMARKS

Claims 1-27 remain in the application. Claims 1, 15 and 26 have been amended in the manner suggested by the examiner at the interview dated December 13, 2006, removing the limitation added by the previous amendment. Claims 1, 15 and 27 have been amended to clarify the references to the “merchant server system” and the “security server system.” No new matter is added. For the reasons set forth below, the amendments are believed to place the application in condition for allowance.

In paragraphs 3 and 4 of the Action, claims 1, 12, 15 and 26 were rejected under 35 USC §112, second paragraph, as being indefinite. In support of the rejection of claims 1, 12, 15 and 26, the examiner cited the limitation “the buyer information otherwise not being provided to the merchant server,” stating that it was not clear as to what is being provided to the merchant server since applicant disclosed above that encrypted buyer information is transferred to the merchant server. As discussed at the interview dated December 13, 2006, that limitation was not necessary in view of the encryption of buyer information and its transfer, as encrypted, to the merchant server, as defined earlier in the respective claims. Accordingly, as suggested by the examiner, that limitation is removed by the above amendments.

At the December 13th interview, the examiner also objected to the use of the term “third” as a modifier to the “third server,” and although not discussed at the interview, would object to the use of the term “fourth” as a modifier to the “fourth server,” throughout the claims. Claims 1, 15 and 27 have now been modified to define “a first server system, said first server system being a merchant server system” and “a second server system, said second server system being a security server system.” Those amendments resolve the “third server system” and “fourth server system” objections of the examiner.

In view of the amendments, there now is no proper basis for the §112 rejections and the examiner’s objections. Those rejections and objections should be reconsidered and withdrawn.

In paragraphs 6 and 7 of the Action, all claims 1-27 were rejected under 35 USC §102(e) as being clearly anticipated by U.S. Patent Publication No. 2004/0260953 (Tsuei). Issue is taken with that position.

In support of the rejection of applicants’ independent claims 1 and 15, the examiner concludes that Tsuei discloses each and every element of those claims in paragraphs 0013-0030

and 0074-0091, without citing any specific portions of those paragraphs. The examiner similarly supports his rejection of applicants' independent claim 12, by citing paragraphs 0013-0030 and 0074-0091 again, and additionally, paragraphs 0029 and 0022 of Tsuei. The examiner similarly supported his rejection of applicants' independent claim 26, by again citing paragraphs 0013-0030 and 0074-0091, and additionally paragraph 0029 of Tsuei. The examiner supported his rejection of applicants' claim 27 based on Mital (presumably, referring to Tsuei), again citing paragraphs 0013-0030 and 0074-0091. The stated bases for all of the rejections were merely instructions to "see" the identified paragraphs of Tsuei, with no specificity of any particular portions of the 30⁺ paragraphs.

However, while Tsuei does relate to anonymous transactions, as do applicants' claims, none of the rejections have a proper basis for the §102 rejection. Applicants' independent claims 1, 12, 15, 26 and 27 define a distinctly different architecture and method from that taught or suggested by Tsuei. There is no teaching of certain elements of applicants' claims 1, 12, 15, 26 and 27 in Tsuei, and thus, there is no proper basis for the §102 rejection.

More particularly, Tsuei defines a hub-and-spoke architecture where a plurality of service providers, or information requestors, are each directly coupled to a central system server, as shown in FIG. 1 of Tsuei. Each of the service providers of Tsuei communicates with the system server over direct communication links; see paragraph 0067 of Tsuei. There is no teaching or suggestion in Tsuei of any communication links between service providers. Tsuei describes the communication between a service provider and the system server at paragraph 0068 in conjunction with FIG. 2, which incorporates the alias method and system 20 of Tsuei. Tsuei goes on to describe that anonymous transaction method and system in succeeding paragraphs. Paragraphs 0074-0091 cited by the examiner describe in detail the operation of the "spoke" communication links to establish an anonymous transaction between a single service provider and the system server. There is no teaching or suggestion of any anonymous communication between any service providers.

In contrast, each of applicants' independent claims defines buyer information being encrypted and communicated by way of a merchant server to another party to a transaction, under limitations where the merchant server cannot decrypt that buyer information. Thus, there are parties to a transaction (e.g., a "third" and/or "fourth" server) who receive buyer information

not from the security server directly, but rather by way of another party (i.e., the merchant server). This aspect of each of applicants' independent claims 1, 12, 15, 26 and 27 is simply not present in Tsuei, and thus, Tsuei does not provide a proper basis for the §102 rejection. That rejection should be reconsidered and withdrawn.

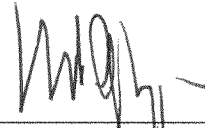
CONCLUSION

The above amendments are believed to place the application in condition for allowance. For the above reasons, it is submitted that there now is no proper basis for the §103 rejections. Those rejections should be reconsidered and withdrawn. All claims 1-27 are believed to be in condition for allowance. Passage to issue is requested.

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If the Examiner believes there are any outstanding issues to be resolved with respect to the above-identified application, the Examiner is invited to telephone the undersigned at their earliest convenience so that such issues may be resolved telephonically.

Respectfully submitted,



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